

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

PROXENSE, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS, CO., LTD. and
SAMSUNG ELECTRONICS AMERICA, INC,

Defendants.

Civil Action No. 6:21-CV-00210-ADA

JURY TRIAL REQUESTED

**DECLARATION OF DAVID L. HECHT IN SUPPORT OF PLAINTIFF’S OPPOSITION
TO DEFENDANTS’ MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, David L. Hecht, am counsel for Plaintiff Proxense, LLC, over 18 years of age and make this declaration based upon personal knowledge. If called to testify as a witness, I could and would testify competently to the same. I submit this declaration in support of Plaintiff Proxense, LLC’s (“Plaintiff” or “Proxense”) Opposition to Defendants’ Motion for Partial Summary Judgment.

1. Attached hereto as Exhibit A1 is a true and correct copy of the excerpts of the deposition of Aviel Rubin, dated September 29, 2022.

2. Attached hereto as Exhibit A2 is a true and correct copy of the excerpts of the deposition of Aviel Rubin, dated September 30, 2022.

3. Attached hereto as Exhibit B is a true and correct copy of a document bearing Bates Number PROX_SAMSUNG_015573.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts of the deposition of Allen Kim, dated September 29, 2022.

5. Attached hereto as Exhibit D is a true and correct copy of Exhibit 5 to the Deposition of Allen Kim, dated August 3, 2022.

6. Attached hereto as Exhibit E is a true and correct copy of excerpts from the deposition of Seth Neilson, dated October 6, 2022.

7. Attached hereto as Exhibit F is a true and correct copy of excerpts from the Expert Report of Avi Rubin, dated August 15, 2022.

8. Attached hereto as Exhibit G is a true and correct copy Samsung's Second Supplemental Responses to Interrogatories 1 and 6, dated August 18, 2022.

9. Attached hereto as Exhibit H is a true and correct copy of a document bearing Bates Number SRA_PROXENSE_011070.

10. Attached hereto as Exhibit I is a true and correct copy of a document bearing Bates Number SAMSUNG_PROXENSE_257105.

11. Attached hereto as Exhibit J is a true and correct copy of a document bearing Bates Number SRA_PROXENSE_058518.

12. Attached hereto as Exhibit K is a true and correct copy of a document bearing Bates Number SAMSUNG_PROXENSE_239299.

13. Attached hereto as Exhibit L is a true and correct copy of a document bearing Bates Number SAMSUNG_PROXENSE_240258.

14. Attached hereto as Exhibit M is a true and correct copy of a document bearing Bates Number SAMSUNG_PROXENSE_240746.

15. Attached hereto as Exhibit N is a true and correct copy of an email dated October 24, 2022.

16. Attached hereto as Exhibit O is a true and correct copy of an email dated August 8,

2022.

17. Attached hereto as Exhibit P is a true and correct copy of excerpts from the deposition of Chris Pickering, dated August 4, 2022.

18. Attached hereto as Exhibit Q is a true and correct copy of excerpts from the deposition of M. Laurentius Marais, dated September 23, 2022.

19. Attached hereto as Exhibit R is a true and correct copy of excerpts from the Opening Expert Report of Jennifer Vanderhart, dated August 8, 2022.

20. Attached hereto as Exhibit S is a true and correct copy of a document bearing Bates Number SAMSUNG_PROXENSE_234898.

21. Attached hereto as Exhibit T is a true and correct copy of a document bearing Bates Number SAMSUNG_PROXENSE_183871.

22. Attached hereto as Exhibit U is a true and correct copy of a excerpts of a document bearing Bates Number SAMSUNG_PROXENSE_186001.

23. Attached hereto as Exhibit V is a true and correct copy of excerpts of a document bearing Bates Number SAMSUNG_PROXENSE_209124.

24. Attached hereto as Exhibit W is a true and correct copy of a document bearing Bates Number SAMSUNG_PROXENSE_285894.

25. Attached hereto as Exhibit X is a true and correct copy of a document bearing Bates Number SRA_PROXENSE_002248.

26. Attached hereto as Exhibit Y is a true and correct copy of a document bearing Bates Number SRA_PROXENSE_005331.

27. Attached hereto as Exhibit Z is a true and correct copy of a document bearing Bates Number SRA_PROXENSE_35298.

28. Attached hereto as Exhibit AA is a true and correct copy of a document bearing Bates Number SAMSUNG_PROXENSE_240589.

29. Attached hereto as Exhibit BB is a true and correct copy of a document bearing Bates Number SAMSUNG_PROXENSE_240746.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed in Livingston, NJ on October 31, 2022



David L. Hecht